



ENZYMATIC THERAPY INCORPORATED

*What **Better** feels like.™*

INTEGRATIVE THERAPEUTICS INC.™
• NF Formulas • PhytoPharmica
Tyler Encapsulations • Vitaline Formulas

9755 SW Commerce Circle, Suite B2
Wilsonville, OR 97070
P: 503.582.8386 • F: 503.582.0467

**ENZYMATIC THERAPY®
&
PHYTOPHARMICA®**

825 Challenger Drive, Green Bay, WI 54311-8328
P: 920.469.1313 • F: 888.570.6460 (Enzymatic)
P: 920.469.9099 • F: 920.469.4418 (Phyto)

October 26, 2004

Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 810
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

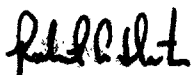
PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Spectrient®	Much more than a daily multiple vitamin-mineral, Spectrient supplies comprehensive daily nutritional support.*	Vitamin A (as vitamin A acetate and 50% as beta-carotene: Betartene® natural mixed carotenoids), Vitamin C (ascorbic acid), Vitamin D (as cholecalciferol), Vitamin E (as d-alpha-tocopheryl succinate), Vitamin K (as phytonadione), Thiamin (as thiamin hydrochloride), Riboflavin (as riboflavin 5' phosphate), Niacin (as niacin, niacinamide, and inositol niacinate), Vitamin B6 (as pyridoxal 5' phosphate), Folic Acid, Vitamin B12 (as cyanocobalamin), Biotin, Pantothenic Acid (as calcium pantothenate), Calcium (as calcium citrate, malate, lysinate, and carbonate), Iron (as iron citrate), Magnesium (as magnesium oxide, citrate, malate, fumarate, succinate, and glutarate), Zinc (as zinc amino acid chelate), Copper (as copper citrate), Manganese (as manganese citrate), Chromium (as chromium arginate), Molybdenum (as molybdenum citrate), Rice protein blend, Vegetable blend (Beet root, Broccoli, Burdock root, Cabbage, Carrot, Dandelion root, Onion, Parsley, Spinach, Beet leaf, Dandelion leaf), PhytoZyme enzyme blend (Amylase, Cellulase, Maltase, Invertase, Lipase, Pectinase with Phytase, Lactase), Choline (as choline bitartrate), DL-Methionine, Eleuthero root (Eleutherococcus senticosus), Gamma-oryzanol, Garlic bulb (Allium sativum) 0.2% allicin, Ginkgo biloba leaf, Hawthorn fruit (Crataegus laevigata), Hesperidin methyl chalcone, Inositol, Milk thistle seed (Silybum marianum) 70% silymarin, NAC (N-acetyl-cysteine), Oat aerial parts (Avena sativa), Turmeric root (Curcuma longa), L-Glutathione, NAG (N-acetyl-D-glucosamine), Spectra Probiotic blend, Boron (as boron citrate), Vanadium (as vanadium citrate)

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I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 

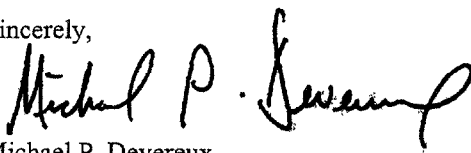
Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 10/26/04

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,



Michael P. Devereux
Chief Financial Officer



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October 27, 2004

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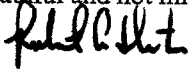
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Spectrient®	Spectrient offers the benefit of botanical support with extracts of oat, ginseng, hawthorn, ginkgo, milk thistle, turmeric, and deodorized garlic. Spectrient also provides added antioxidant support with glutathione, NAG, NAC, and hesperidin methyl chalcone.*	Vitamin A (as vitamin A acetate and 50% as beta-carotene: Betartene® natural mixed carotenoids), Vitamin C (ascorbic acid), Vitamin D (as cholecalciferol), Vitamin E (as d-alpha-tocopheryl succinate), Vitamin K (as phytonadione), Thiamin (as thiamin hydrochloride), Riboflavin (as riboflavin 5' phosphate), Niacin (as niacin, niacinamide, and inositol niacinate), Vitamin B6 (as pyridoxal 5' phosphate), Folic Acid, Vitamin B12 (as cyanocobalamin), Biotin, Pantothenic Acid (as calcium pantothenate), Calcium (as calcium citrate, malate, lysinate, and carbonate), Iron (as iron citrate), Magnesium (as magnesium oxide, citrate, malate, fumarate, succinate, and glutarate), Zinc (as zinc amino acid chelate), Copper (as copper citrate), Manganese (as manganese citrate), Chromium (as chromium arginate), Molybdenum (as molybdenum citrate), Rice protein blend, Vegetable blend (Beet root, Broccoli, Burdock root, Cabbage, Carrot, Dandelion root, Onion, Parsley, Spinach, Beet leaf, Dandelion leaf), PhytoZyme enzyme blend (Amylase, Cellulase, Maltase, Invertase, Lipase, Pectinase with Phytase, Lactase), Choline (as choline bitartrate), DL-Methionine, Eleuthero root (Eleutherococcus senticosus), Gamma-oryzanol, Garlic bulb (Allium sativum) 0.2% allicin, Ginkgo biloba leaf, Hawthorn fruit (Crataegus laevigata), Hesperidin methyl chalcone, Inositol, Milk thistle seed (Silybum marianum) 70% silymarin, NAC (N-acetyl-cysteine), Oat aerial parts (Avena sativa), Turmeric root (Curcuma longa), L-Glutathione, NAG (N-acetyl-D-glucosamine), Spectra Probiotic blend, Boron (as boron citrate), Vanadium (as vanadium citrate)

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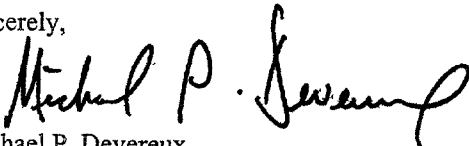
Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 10/27/04

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Michael P. Devereux
Chief Financial Officer